

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

STATE OF NEW YORK, et al.,

Plaintiffs,

v.

UNITED STATES DEPARTMENT  
OF COMMERCE, et al.,

Defendants.

18-CV-2921 (JMF)

**SECOND JOINT STIPULATION REGARDING SCOPE OF ADMINISTRATIVE  
RECORD**

The parties hereby stipulate to the addition of the following materials to the Administrative Record in this case:

64. In addition to the documents already designated, the Administrative Record includes the native Excel files contained at PX-16 (corresponding to the slipsheets at PX-4, AR 12128-12129, AR 12134-12138; and PX-13, AR 12869, AR 12964-12966), with the exception of the file named < noisy\_7.csv >.

Plaintiffs reserve the right to move that additional materials be considered part of the Administrative Record in this action.

Dated: November 12, 2018

Respectfully submitted,

BARBARA D. UNDERWOOD  
*Attorney General of the State of New York*

**SO ORDERED.**



**November 13, 2018**

By: /s/ Matthew Colangelo  
Matthew Colangelo, *Executive Deputy Attorney General*  
Elena Goldstein, *Senior Trial Counsel*  
Office of the New York State Attorney General  
28 Liberty Street  
New York, NY 10005  
Phone: (212) 416-6057  
matthew.colangelo@ag.ny.gov

Attorneys for the *State of New York* Plaintiffs

AMERICAN CIVIL LIBERTIES UNION  
ARNOLD & PORTER KAYE SCHOLER LLP

By: /s/ John Freedman

Dale Ho  
American Civil Liberties Union Foundation  
125 Broad St.  
New York, NY 10004  
(212) 549-2693  
dho@aclu.org

Andrew Bauer  
Arnold & Porter Kaye Scholer LLP  
250 West 55th Street  
New York, NY 10019-9710  
(212) 836-7669  
Andrew.Bauer@arnoldporter.com

Sarah Brannon\*  
American Civil Liberties Union Foundation  
915 15th Street, NW  
Washington, DC 20005-2313  
202-675-2337  
sbrannon@aclu.org

John A. Freedman  
Arnold & Porter Kaye Scholer LLP  
601 Massachusetts Avenue, N.W.  
Washington, DC 20001-3743  
(202) 942-5000  
John.Freedman@arnoldporter.com

*\* Not admitted in the District of Columbia;  
practice limited pursuant to D.C. App. R.  
49(c)(3).*

Perry M. Grossman  
New York Civil Liberties Union Foundation  
125 Broad St.  
New York, NY 10004  
(212) 607-3300 601  
pgrossman@nyclu.org

Attorneys for the *NYIC* Plaintiffs

*Counsel for Defendants*

JOSEPH H. HUNT  
Assistant Attorney General

BRETT A. SHUMATE  
Deputy Assistant Attorney General

JOHN R. GRIFFITHS  
Director, Federal Programs Branch

CARLOTTA P. WELLS  
Assistant Branch Director

*/s/ Carol Federighi* \_\_\_\_\_

CAROL FEDERIGHI

KATE BAILEY

GARRETT COYLE

STEPHEN EHRLICH

Trial Attorneys

United States Department of Justice

Civil Division, Federal Programs Branch

1100 L Street NW, Washington, DC 20005

(202) 514-9239